

### **REMARKS/ARGUMENTS**

Prior to the entry of this Amendment, claims 1-5, 7 and 9-46 were pending in this application. Claim 4 has been amended, no claims have been canceled, and no claims have been added herein. Therefore, claims 1-5, 7 and 9-46 remain pending in this application. Applicant respectfully requests reconsideration of these claims for at least the reasons presented below.

#### **35 U.S.C. § 103 Rejection, Burroughs in view of Shiigi**

The Office Action has rejected claims 1-5, 7, 9-14, 17, 21, 25, 26, 28, 30-35, 39, 44 and 45 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,341,289 of Burroughs *et al.* (hereinafter "Burroughs") in view of U. S. Patent Pub. 2003/0014442 A1 of Shiigi *et al.* (hereinafter "Shiigi"). The Applicants respectfully submit that the Final Office Action does not establish a *prima facie* case of obviousness in rejecting these claims, as amended. Therefore, the Applicants request reconsideration and withdrawal of the rejection.

In order to establish a *prima facie* case of obviousness, the Office Action must establish: 1) some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or combine their teachings; 2) a reasonable expectation of success of such a modification or combination; and 3) a teaching or suggestion in the cited prior art of each claimed limitation. See MPEP §706.02(j). However, neither reference, alone or in combination teaches or suggests determining one or more data stores of a plurality of data stores to service a data access request wherein said plurality of data stores comprises at least one relational database and at least one Lightweight Directory Access Protocol (LDAP) directory. Furthermore, neither reference, alone or in combination, teaches or suggests a data access request that includes accessing data in both the relational database and the LDAP directory.

As discussed previously, Burroughs "relates to a schema mapping mechanism for mapping an object between the object-oriented schema of an application program and the

relational schema of a database” (Col. 3, lines 39-43). More specifically, “[t]he relational database provides the mechanism for persistently storing object data in the computer system, and can be any suitable relational database such as those available from IBM, Oracle or Microsoft.” (Col. 7, lines 46-50, of Burroughs) That is, Burroughs describes a mapping mechanism using a relational database as a data store. However, Burroughs does not disclose a mapping or partition mechanism using a plurality of data stores. Further, Burroughs does not disclose that the plurality of data stores comprise both a relational database and an LDAP directory. Thus, as the Final Office Action points out, Burroughs does not teach or suggest "wherein said set of data stores comprises at least one relational database and at least one Lightweight Directory Access Protocol (LDAP) directory."

To correct this deficiency, the Final Office Action introduced Shiigi. More specifically, the Final Office Action cites paragraph 88 of Shiigi which states in part that the system can be "implemented as a Java application that can run on the following application platforms for the various functions required in the system: Operating System; Java Application Server; Relational Database; and LDAP Directory Server." However, the applicants respectfully disagree that this statement teaches or suggests determining one or more data stores of a plurality of data stores to service a data access request wherein said plurality of data stores comprises at least one relational database and at least one Lightweight Directory Access Protocol (LDAP) directory. The applicants contend that this only provides a list of different possible implementations rather than disclosing multiple data stores of different types. Furthermore, and supporting the applicants' understanding of the reference, Shiigi goes on to state that "a single physical repository is used to store both the Web site content and the structure by which this content is organized." (para. 0089) Therefore, Shiigi does not disclose a plurality of data stores. Rather, like Burroughs, Shiigi discloses only one data store. Thus, Shiigi also fails to teach or suggest, alone or in combination with Burroughs, determining one or more data stores of a plurality of data stores to service a data access request wherein said plurality of data stores comprises at least one relational database and at least one LDAP directory.

Claim 1, upon which claims 2-5, 7, and 9-20 depend; claim 21, upon which claims 22-24 depend; claim 25, upon which claims 26 and 27 depend; claim 28; claim 29, upon which claims 30-41 depend; claim 42, upon which claims 43-46 depend, each of these claims recites in part "determining one or more data stores of a plurality of data stores to service said data access request, said step of determining includes accessing one or more mappings of said one or more variables to said plurality of data stores and using said mappings to evaluate partition expressions for said data stores wherein said plurality of data stores comprise at least one relational database and at least one Lightweight Directory Access Protocol (LDAP) directory." Neither reference, alone or in combination, teaches or suggests determining one or more data stores of a plurality of data stores to service a data access request wherein the plurality of data stores comprises at least one relational database and at least one LDAP directory. For at least these reasons, claims 1-5, 7, 9-14, 17, 21, 25, 26, 28, 30-35, 39, 44, and 45 should be allowed.

The dependent claims are thought to be allowable for additional reasons. For example, claim 4 recites in part said data access request includes accessing data in both the relational database and the LDAP directory. Neither Burroughs nor Shiigi teach or suggest a data access request that includes accessing data in both of a relational database and an LDAP directory. Rather, as described above, both Burroughs and Shiigi teach using a single data store of a single type. For at least this additional reason, claim 4 is thought to be allowable.

**35 U.S.C. § 103 Rejection, Burroughs in view of Shiigi and in further view of Bachmann**

The Office Action has rejected Claims 15, 16 and 23 under 35 U.S.C. § 103(a) as being unpatentable over Burroughs in view Shiigi and in further view of U.S. Patent No. 6,085,188 of Bachmann *et al.* (hereinafter "Bachmann"). The applicants respectfully request withdrawal of the rejection and allowance of the claims for at least the reason that claims 15, 16, and 23 each depend upon a base claim that is thought to be allowable as discussed in detail above.

**35 U.S.C. § 103 Rejection, Burroughs in view of Shiigi and further in view of Mullins**

The Office Action has rejected claims 18, 19, 24, 27, 29, 36, 38, 40-43 and 46 under 35 U.S.C. § 103(a) as being unpatentable over Burroughs in view of Shiigi and further in view of U.S. Patent No. 6,999,956 of Ward Mullins (hereinafter "Mullins"). The applicants respectfully request withdrawal of the rejection and allowance of the claims for at least the reason that claims 18, 19, 24, 27, 29, 36, 38, 40-43 and 46 each depend upon a base claim that is thought to be allowable as discussed in detail above.

**CONCLUSION**

In view of the foregoing, Applicant believes all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

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Respectfully submitted,

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